

EXHIBIT A



United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

July 28, 2023

BY EMAIL

Zawadi Baharanyi, Esq.
Amanda Mayo, Esq.
Federal Defenders of New York
52 Duane Street, 10th Floor
New York, NY 10007

Re: *United States v. Steven Perez, a/k/a "Lucha," S1 22 Cr. 644 (JSR)*

Dear Ms. Baharanyi and Ms. Mayo:

The Government writes to provide notice of evidence as to certain other crimes, wrongs, or acts the Government may seek to introduce in its case-in-chief at trial in the above-captioned matter. The Government reserves the right to introduce additional evidence of other crimes, wrongs, or acts and will promptly provide notice if the Government elects to do so.

The evidence described below is admissible as direct evidence of the offenses charged in the Indictment. To the extent that such evidence is not otherwise admissible as direct evidence of the charged offenses, the Government may seek in the alternative to introduce this evidence pursuant to Federal Rule of Evidence 404(b). Specifically, the Government may seek to introduce in its case-in-chief evidence of the following conduct:

- Between on or about May 15, 2020 and on or about November 4, 2020, the defendant's co-conspirator Keith Vereen—while acting in his capacity as a straw purchaser—bought at least 25 firearms from federal firearms licensees ("FFLs") in South Carolina.
- On or about July 3, 2021, during a traffic stop in Wakefield, Massachusetts, the defendant was arrested with ten other individuals while in possession of, among other things, eight firearms, over one thousand rounds of ammunition of different calibers, night vision goggles, and eleven ballistic vests.

This evidence is admissible as direct evidence of the charged offenses because, among other reasons, it bears directly on the scope of the defendant's conduct and his agreement with others to commit the crimes, as well as his intent. It also provides necessary background and context for the relationship between members of the conspiracy and the charged offenses. In the alternative, this evidence is admissible under Rule 404(b) as proof of the defendant's motive,

opportunity, intent, plan, knowledge, absence of mistake, or lack of accident with respect to the charged conduct.

The Government reserves the right to supplement this notice in advance of trial.

Very truly yours,

DAMIAN WILLIAMS
United States Attorney

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